

9/9/03 - 2646

**Capito, Bonnie P. (EFDLANT)**

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**From:** Jackson, Rodger W. (EFDLANT)  
**Sent:** Wednesday, September 24, 2003 12:00 PM  
**To:** Capito, Bonnie P. (EFDLANT)  
**Subject:** FW: Site 85 Decision Document

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Rodger W. Jackson, P.E.  
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-----Original Message-----

From: Townsend.Gena@epamail.epa.gov  
[mailto:Townsend.Gena@epamail.epa.gov]  
Sent: Tuesday, September 09, 2003 1:19 PM  
To: Doug.Bitterman@ch2m.com  
Cc: christopherjk@cherrypoint.usmc.mil; GeorgeL100@aol.com;  
george.lane@ncmail.net; JacksonRW@efdlant.navfac.navy.mil;  
Thornton.Michelle@epamail.epa.gov; Stancin.Martin@ch2m.com  
Subject: RE: Site 85 Decision Document

Thanks Doug,

I have read the response and it is clear as mud, [ : ), just kidding], I understand completely. It is a little confusing, as to the meaning, when reading it as a statement to support a no action. I would suggest adding a statement to explain: it could read something like this (only a suggestion), "Iron and manganese exceeded twice the avg. concentration in 2 of the 4 samples, this is a highly conservative number that is used only for screening purposes. Further review of the data identified the concentrations to be well within the background range for MCAS Cherry Point".

I just want to make sure that anyone reading this document can arrive at the same NFA decision. If we need to discuss further give me a call. I will be in all the week except Friday.

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To: Gena Townsend/R4/USEPA/US@EPA

christopherjk@cherrypoint.usmc.mil,  
09/09/2003 12:10  
george.lane@ncmail.net,  
PM  
Michelle  
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cc:  
GeorgeL100@aol.com,  
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Subject: RE: Site 85 Decision Document

Gena:

I will attempt to answer your questions. We use twice the average concentration of the background sample set as the agreed upon "screening level" to perform a preliminary, quantitative analysis of site-specific data to see if a concentration of a particular inorganic constituent is site-related or naturally occurring. However, if a particular result exceeds this somewhat arbitrary benchmark, it doesn't necessarily mean that it is a contaminant caused by site-related activities. What we are trying to say with the statements you cite is: Yes, iron and manganese exceeded 2X average background concentrations in 2 of 4 samples, however we do not feel that these exceedances of 2X average background represent clear evidence of site contamination. Another way to put these results in perspective is to compare the results to the background range rather than 2X the average. Using this comparison, the results are well within the concentration ranges for iron and manganese in the approved background sample data set.

As far as why we identify the 2X average background number, I think the answer is that it is prudent to use a conservative benchmark to preliminarily screen data. A closer look is warranted for data flagged at this conservative screening stage. I suppose that if a high percentage of the data were within the range of background, but clustered at the upper end of the range above 2X the average, it could possibly be indicative of a site-related problem. However, in our case, given that only 2 out of the 4 results exceed 2X average background for iron and manganese, but are within the range of background, it doesn't seem to us that there is much if anything pointing toward site-related disposal activities as the source of these constituents.

Let me know if this explanation helps. I would be happy to discuss it further if I haven't totally answered your questions.

Take care,

Doug

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-----Original Message-----

From: Townsend.Gena@epamail.epa.gov  
[mailto:Townsend.Gena@epamail.epa.gov]  
Sent: September 09, 2003 11:30 AM  
To: Bitterman, Doug/VBO

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george.lane@ncmail.net; JacksonRW@efdlant.navfac.navy.mil;  
Thornton.Michelle@epamail.epa.gov; Martin, Stacin/VBO  
Subject: RE: Site 85 Decision Document

Hi all,

I have reviewed the signature page and have one question.

The first conclusion states: "iron, lead and manganese exceeded twice the average Cherry Point background". The next sentence states: "although iron and manganese exceeded twice the average background they are well within the range of background concentrations at Cherry Point". I am confused by what is meant by this statement. Are you saying, if the concentrations are not average and multiplied by 2 then they will fall within an acceptable range? If this is the case, why identify the "twice average background number"? Also, it appears that there are two background numbers in use. Please help me understand this statement.

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